

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ESTATE OF MARCO ANTONIO MALDONADO	X	
	:	
	:	No. 2:22-cv-3474
Plaintiff,	:	
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, et al.	:	
	:	
Defendants.	:	
	X	

**PROPOSED SCHEDULE WITH DATES CERTAIN**

Pursuant to this court’s order of May 17, 2024, Plaintiff proposes the following pretrial schedule with dates certain shall apply to this action:

- |  |               |
|--|---------------|
| Fact Discovery Deadline                            | June 27, 2024 |
| - Proposed Date of Depositions                     |               |
| o Defendant, Bruce Dougherty- May 31, 2024 at 2 pm |               |
| o Defendant, Bruce DeNoble- June 4, 2024 at 2 pm   |               |
| o Detective Herberto Aponte- June 6, 2024 at 10 am |               |
| o Richard Henderson-June 6, 2024 at 2 pm           |               |
| o Campolongo June 11, 2024 at 10 am                |               |
| o Javiar Maldonado- June 12, 2024 10 am            |               |
| o Jennifer Merrigan- June 13, 2024 10 am           |               |
| All Expert Discovery                               |               |
| September 12, 2024                                 |               |
| Affirmative Expert Reports                         |               |
| July 18, 2024                                      |               |
| Responsive Expert Reports                          |               |
| August 22, 2024                                    |               |
| Motions for Summary Judgment                       |               |
| September 26, 2024                                 |               |

Date: May 21, 2024

Respectfully Submitted,

/s/Zainab Khadija Shields, Esquire

Zainab Khadija Shields, Esquire

Attorney for Plaintiffs

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